

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

CENTRAL ILLINOIS LIGHT COMPANY)	
d/b/a AmerenCILCO)	
)	
CENTRAL ILLINOIS PUBLIC SERVICE)	
COMPANY)	07-0539
d/b/a AmerenCIPS)	
)	
ILLINOIS POWER COMPANY)	
d/b/a AmerenIP)	
)	
Approval of the Energy Efficiency and)	
Demand-Response Plan.)	

**PRE-HEARING MEMORANDUM
OF THE CITIZENS UTILITY BOARD**

Pursuant to the Administrative Law Judge’s November 20, 2007 request, the Citizens Utility Board (“CUB”), by its attorneys, hereby files its Pre-hearing Memorandum, summarizing the issues put forward in the testimony of CUB witness Christopher C. Thomas. At this time, CUB does not intend to cross-examine witnesses at the upcoming evidentiary hearing.

CUB Exhibit 1.0, the Direct Testimony of Christopher C. Thomas, detailed two problems with the proposed energy efficiency and demand response plan filed by Central Illinois Light Company d/b/a AmerenCILCO, Central Illinois Public Service Company d/b/a AmerenCIPS, and Illinois Power Company d/b/a AmerenIP (collectively, “Ameren” or “the Company”). First, “Ameren’s cost estimates are only assumptions, which are not based on the Company’s own experience,” and are inconsistent with Ameren’s proposed budget. CUB Ex. 1.0 at 2, 4, 6. Instead, the Commission should ensure that Rider EDR only recovers actual costs. *Id.* Second, “Ameren must maximize the value of the direct load control program and return any financial

benefits to customers by modifying Rider EDR.” *Id.* at 2. To that end, Mr. Thomas’ testimony suggests tariff language that would account for any future financial benefits from the use of demand response programs. *Id.* at 8.

In Reply Testimony, Ameren witness Leonard M. Jones addressed CUB’s recommendation that the Commission ensure that Ameren only recover actual costs. Ameren Ex. 8.0 at 4-5. Mr. Jones also addressed CUB’s recommendation that Ameren maximize the value of the direct load control program and return any financial benefits to customers via Rider EDR. *Id.* at 5-6. Ameren witness Val R. Jensen addressed the inconsistency between Ameren’s cost estimate assumptions and its proposed budget, attaching exhibits correcting an error and showing the correction’s effect on Ameren’s proposed plan. Ameren Ex. 9.0 at 17-18.

WHEREFORE, CUB respectfully submits this Pre-Hearing Memorandum.

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